

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re:

Active World Holdings Inc. *dba* Active World Club

Debtor

WFD Capital, LLC

Movant,

v.

Active World Holdings Inc. *dba* Active World Club

Respondent.

Case No.: 24-12780-pmm

Chapter 11

Hearing Date: Sept. 24, 2024, 10:00 am

Honorable Patricia M. Mayer, U.S.B.J.

**NOTICE OF MOTION OF WFD CAPITAL, LLC
FOR RELIEF FROM AUTOMATIC STAY**

PLEASE TAKE NOTICE. Movant, WFD Capital, LLC, by and through its undersigned counsel, has filed papers with the Court to obtain relief from the automatic stay (the “Motion”).

1. **Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

2. **If you do not want the Court to grant the relief sought in this Motion** or if you want the Court to consider your views on the motion, then **on or before September 17, 2024 you or your attorney must file a response to the Motion.** (*See instructions on next page.*)

3. A hearing on the Motion is scheduled to be held on **September 24, 2024 at 10:00 a.m.** in the **United States Bankruptcy Court, Eastern District of Pennsylvania, The Gateway Building, 201 Penn Street, 4th Floor, Reading, PA 19601.** Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing.

4. **If you do not file a response to the Motion, the court may cancel the hearing and enter an order granting the relief requested in the Motion.**

5. You may contact the Bankruptcy Clerk's office for Philadelphia cases at (215) 408- 2800 and for Reading cases at 610-208-5040 to find out whether the hearing has been canceled because no one filed a response.

6. If a copy of the motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney whose name and address is listed on the next page of this Notice.

FILING INSTRUCTIONS

7. **If you are required to file documents electronically by Local Bankruptcy Rule 5005-1, you must file your response electronically.**

8. **If you are not required to file electronically, you must file your response at:**

Clerk's Office, U.S. Bankruptcy Court
Eastern District of Pennsylvania
The Gateway Building
201 Penn Street, Suite 103
Reading, PA 19601

9. If you mail your response to the Bankruptcy Clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 on the previous page of this Notice.

10. On the same day that you file or mail your response to the Motion, you must mail or deliver a copy of the response to the movant's attorney:

Allison L. Domowitch, Esquire
Fleischer, Fleischer & Suglia, P.C.
Four Greentree Centre
601 Route 73 North, Suite 305
Marlton, NJ 08053
adomowitch@fleischerlaw.com

11. If applicable, you must also deliver a copy of your response to the following:

George M. Lutz, Esquire
Hartman, Valeriano, Magovern
& Lutz, P.C.
1025 Berkshire Blvd., Ste. 700
Wyomissing, PA 19610
Attorney for Debtor

Holly Smith Miller, Esquire
Gellert Seitz Busenkell & Brown
901 Market Street, Ste. 3020
Philadelphia, PA 19107
Subchapter V Trustee

Kevin P. Callahan, Esquire
Department of Justice
Robert N.C. Nix Federal Building
900 Market Street, Ste. 320
Philadelphia, PA 19107
US Trustee

/s/ Allison L. Domowitch

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Attorneys for Creditor/Movant
WFD Capital, LLC

Dated: September 3, 2024